REMARKS/ARGUMENTS

The above identified patent application has been amended. Reconsideration and reexamination of the above identified patent application is hereby requested. Claims 1 to 72 are now in the application. Claims 1, 29 and 48 have been amended.

The Examiner has rejected Claims 1 and 29 under 35 U.S.C. §103(a) as being unpatentable over Sezan et al. (5,956,458) in view of Henmi et al. (5,390,027), Yamagami et al. (6,334,025) and Lemaire et al. (5,444,768).

Amended Claim 1 calls for (underlining added for emphasis) a method for providing voice titles for video programs recorded on a recording medium comprising:...recording video programs on the recording medium;...generating audio signals of titles for the recorded programs;...converting the audio signals to _textual title signals_;...displaying on a screen a directory of the video programs recorded on the recording medium, _wherein the directory includes textual titles associated with the displayed video programs and wherein the textual titles are generated from the textual title signals_;...selecting one of the video programs from the directory; and..._converting a stored textual title signal_ corresponding to the selected video program to an audio signal to apprise a user of the voice title of the selected video program.

Amended Claim 29 calls for (underlining added for emphasis) an apparatus for providing voice titles for video programs recorded on a recording medium comprising:...means for recording video programs on a recording medium and displaying on a screen a directory of the video programs recorded on the recording

-16-

medium, and for selecting one of the video programs from the directory, <u>wherein the directory includes textual titles associated with the displayed video programs and wherein the textual titles are generated from the textual title signals;</u> and...audio processing means... for generating...converting... storing the textual title signals, and for converting a stored textual title signal...to and audio signal to apprise a user of the voice title of the selected video program.

As such, the Applicants submit that Amended Claims 1 and 29 are not unpatentable over Sezan in view of Henmi, Yamagami and Lemaire.

Yamagami discloses displaying a directory of image, audio and text files, wherein the <u>files are represented by icons</u>. (Col. 10, lines 40-55) In order to access the contents of a text file, a user must "select and activate" the text icon displayed in the directory. (Col. 11, lines 38-47) The Applicants fail to see where Yamagami discloses, teaches or suggests any means by which these icons may be labeled with substantive readable characters. Amended Claim 1 and 29 of the present invention call for <u>displaying textual titles generated from stored audio signals</u> associated with the displayed video programs in order to aid the user with the selection of a particular entry.

Yamagami teaches away from labeling these icons with substantive characters readable by the user. Yamagami discloses "small icons 511, 512 for audio and text, respectively, at the bottom of the index image 501 indicate whether there is text or audio linked to this image file." (Col. 10, lines 56-58)

Yamagami does not teach that <u>the icon itself could indicate to the user what that data actually is</u> by incorporating in its design a <u>sample of the stored text</u> (i.e. a textual title). Yamagami teaches that <u>this icon is a graphic only</u>, and will <u>change to reflect the presence or absence of stored data simply by changing color rather than incorporating a particular title</u>. (Col. 10, lines 60-63) Were the icon to incorporate a character based description in its graphical design, that alone would be sufficient to indicate the presence of stored data, making the use of color unnecessary.

Yamagami further teaches that only when the user wishes to select a text icon and open its associated file is the information contained therein finally converted to readable characters. (Col. 11, lines 42-47) In the present invention this conversion happens before any selection and serves to aid in that selection by labeling the user's choices with words rather than graphical icons. The users of Yamagami's invention can still distinguish between various untitled text icons by their order of recording time (Col. 10, lines 50-51) or by their inclusion in a group file (Col. 13, lines 10-16), but that user will have to select the untitled text icon to discover exactly what the file contains.

The examiner has stated that, "the text icons contain at least part of the text because in the case that a file only contains text or text and audio there would be no way to distinguish between files since there is not an image icon." The applicants respectfully contend that given the above arguments, and given the fact that Fig. 5 of Yamagami also

-18-

discloses audio files not associated with images <u>or</u> text (which therefore <u>must</u> be untitled), the user of the invention disclosed in Yamagami must sort through untitled files that sometimes have no associated image as best they can using their order of recording time or grouping. Setting aside the above arguments for the moment, even if these large icons <u>did</u> include textual titles, and even if Yamagami <u>did</u> relate to the recording of full motion video (which it does not), the present invention would not read on this prior art unless "small icon" 511 of Fig. 5 also incorporated a textual title. The small icons of Fig. 5, unlike the large ones, are the only icons "associated with the displayed video program" as per claim one of the present invention. The Applicants argue that these small icons do not incorporate textual titles for all the reasons stated above, and for the further reason that their small size and the limited room on the display precludes the inclusion of such titles.

The examiner has further stated that Yamanagi discloses recording moving images. The Applicants respectfully disagree. Yamanagi discloses, "When the photographer manipulates the operating unit to instruct the camera to execute photography, the CPU for signal processing control halts the display of the moving picture… and then records the compressed digital image data on the recording medium." (Col. 7 lines 60-65) Thus, while Yamanagi <u>displays</u> moving images prior to a picture being taken, <u>that display is halted prior to the recording of the still picture</u>. As argued in the previous response dated 4/11/03, the digital camera of Yamagami records photographic pictures and associates them with recorded audio files. The present

-19-

invention records a full motion video program which itself includes an audio track, and then further records a second, separate audio track to be associated with that video segment. Recording separate still-image and audio files does not describe, teach or suggest associating <u>independent audio files</u> <u>with a recording that features integrated audio and video.</u>

Accordingly, the Applicants submit that in addition to Yamagami not disclosing all the elements claimed in the present invention, there is no suggestion to combine Yamagami with the references Sezan, Lemaire or Henmi to result in the claimed invention.

Because the claim elements of generating, converting and displaying textual title signals is present neither in Yamagami nor in Sezan, Lemaire or Henmi, the Applicants submit that Amended Claims 1 and 29 are not unpatentable over the cited references. Claims 2-3, 7, 10-15, 17, 19-22 and 25-28 are dependent on Amended Claim 1. Claims 30-47 are dependent on Amended Claim 29. As such, these dependent claims are believed allowable based upon Amended Claims 1 and 29.

The Examiner has rejected Claim 48 under 35 U.S.C. §103(a) as being unpatentable over Yuen et al. (5,488,409) in view of Yamagami.

Amended Claim 48 calls for (underlining added for emphasis) an apparatus for providing voice title information for video programs recorded on a recording medium, comprising:...a random access memory;...a video program recording control logic controller;...a microprocessor random access memory controller coupled between the random access memory and the video program

-20-

recording control logic controller; and...an audio input device coupled to the video program recording control logic controller and responsive .to audio signals;...such that audio signals are converted to textual title signals...and stored in the random access memory....as stored textual title signals for displaying textual titles of video programs recorded on the recording medium.

Yamagami discloses displaying a directory of image, audio and text files, wherein the files are represented by icons. (Col. 10, lines 40-55) As. discussed above, Yamagami discloses the conversion, storage and display of untitled text files in the form of graphical icons. Amended Claim 48 calls for converting and storing an audio file as a text file for the purpose of displaying textual titles of video programs. As such, the Applicants submit that Amended Claim 48 is not unpatentable over the cited references. Claim 49 is dependent on Amended Claim 48, therefore this claim is believed allowable based upon Amended Claim 48.

The Examiner has rejected Claims 50 and 62 under 35 U.S.C. §103(a) as being unpatentable over Sezan et al. in view Yamagami.

Claim 50 calls for (underlining added for emphasis) a method for providing voice titles for video programs recorded on a recording medium comprising:....recording video programs on the recording medium;...generating audio signals of titles for the recorded programs;...converting the audio signals to textual title signals and storing the textual title signals; and...displaying on a screen a directory of the video programs

recorded on the recording medium, <u>the directory including textual titles derived from the stored textual title signals</u>.

Claim 62 calls for (underlining added for emphasis) an apparatus for providing voice titles for video programs recorded on a recording medium comprising:...means for recording video programs on a recording medium and displaying on a screen a directory of the video programs recorded on the recording medium <u>the directory including textual titles derived from stored textual title signals</u>; and...audio processing means... for generating...converting...and storing the textual title signals.

Yamagami discloses displaying a directory of image, audio and text files, wherein the <u>files are represented by icons</u>. (Col. 10, lines 40-55) As discussed above, Yamagami discloses the conversion, storage and display of <u>untitled</u> text files in the form of graphical icons. Claims 50 and 62 call for displaying a directory including <u>textual titles derived from stored textual title signals</u>. Therefore, the Applicants submit that Claims 50 and 62 are not unpatentable over the cited references. Claims 51-61 are dependent on Claim 50. Claims 63-72 are dependent on Claim 62. As such, these dependent claims are believed allowable based upon Claims 50 and 62.

In view of the above remarks it is submitted that the claims are patentably distinct over the prior art and that all the rejections to the claims have been overcome. Reconsideration and reexamination of the above Application is requested.

Respectfully submitted,

CHRISTIE, PARKER & HALE, LLP

By _____

Colin T Dorrian
Reg. No. P-54,658
626/795-9900

CTD/mac
MAC PAS528812.1-*-10/28/03 2:30 PM